UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

HITLER CALLE, individually and on behalf of others similarly situated,

Plaintiffs,

-against-

PIZZA PALACE CAFÉ LLC, SASHA ISHAQOV, YURI ISHAQOV, and VLADY DJOURAEV,

Defendants.

Case No. 20-CV-4178

MOTION TO WITHDRAW AS COUNSEL

Michael Faillace, Esq., the undersigned counsel, respectfully moves to withdraw as counsel for Plaintiff(s) in the above-captioned matter, as his last day of work with the law firm of Michael Faillace & Associates, P.C. (the "Firm") was November 7, 2021. Furthermore, he was suspended from practice by the Southern District of New York on November 8, 2021 and he was suspended by Eastern District of New York effective December 3, 2021. Mr. Faillace will not individually be asserting a charging or retaining lien in this case.

Prior to the undersigned's suspension by the Southern District of New York, the undersigned withdrew from the Firm and Catalina Sojo, Esq., became the sole owner of the Firm. The Firm has been renamed CSM Legal P.C. CSM Legal P.C., and specifically Ms. Sojo and Clela Errington, Esq., will continue to represent the Plaintiffs in this matter, and no party will be prejudiced if this Motion is granted. Plaintiffs have been notified of this arrangement and consents to it.

WHEREFORE, undersigned counsel respectfully requests that this Court permit Michael Faillace to withdraw as counsel for the Plaintiff(s) in this matter.

Dated: New York, New York December 14, 2021 Respectfully submitted,

/s/ Michael Faillace
Michael Faillace, Esq.

Attorney for Plaintiff